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January 9, 2014

VIA ELECTRONIC MAIL AND FACSIMILE

Gary Tsirelman, Esq.
Gary Tsirelman, P.C.
129 Livingston Street
Brooklyn, New York 11201

Re: *Government Employees Ins. Co., et al. v.*
Five Boro Psychological Services, P.C., et al.
Docket No. 12-cv-2448(JG)(VMS) (E.D.N.Y.)
NOTICE OF DEFAULT
RR File No.: 005100-00073

Dear Mr. Tsirelman,

As you know, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company and GEICO Casualty Co. (collectively "GEICO" or "Plaintiffs") in the above-referenced matter.

Pursuant to Sections 2 and 8 of the Settlement Agreement in the above-referenced matter between GEICO and your clients John Braun, Five Boro Psychological Services, P.C., All Boro Psychological Services, P.C., and Five Boro Psychological and Licensed Master Social Work Services, P.L.L.C. (collectively the "All Boro Defendants"), **I hereby am providing you with notice that the All Boro Defendants are in default of their obligations under Section 2 of the Settlement Agreement. In particular, the All Boro Defendants are in default of their obligation to tender the second and third \$10,000.00 installments of the Settlement Proceeds, as that term is defined in the Settlement Agreement, by December 1, 2013 and January 1, 2014.**

Pursuant to the terms of the Settlement Agreement, your clients now have 15 days to cure their default. To the extent that they fail to cure their default within the requisite period, please take notice that GEICO will enforce its rights under the Settlement Agreement, including but not limited to its right to enter a judgment against the All Boro Defendants, to recover its fees, costs, and disbursements, and to void the release received by the All Boro Defendants under the Settlement Agreement.

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Should GEICO enter a judgment against the All Boro Defendants, it will take the necessary measures to enforce the judgment, including but not limited to discovery in aid of enforcement of the judgment.

Please be guided accordingly.

Very truly yours,

RIVKIN RADLER LLP

/s/ Max Gershenoff

Max Gershenoff

cc: Barry Levy, Esq.
Michael Versichelli, Esq.
Brian Bank, Esq.